



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10

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OFFICE OF
ECOSYSTEMS,
TRIBAL AND PUBLIC
AFFAIRS

January 7, 2014

Kimpton Cooper, Team Leader
Walla Walla Ranger District
1415 West Rose Street
Walla Walla, Washington 99362

Re: U.S. Environmental Protection Agency comments for the Umatilla National Forest, Walla Walla Ranger District; Oregon Tollgate Fuels Reduction Project Final Environmental Impact Statement (EPA Project Number: 10-055-AFS).

Dear Mr. Cooper:

This review was conducted in accordance with our responsibilities under the National Environmental Policy Act and Section 309 of the Clean Air Act. Section 309 specifically directs the EPA to review and comment in writing on the environmental impacts associated with all major federal actions.

In our February 12, 2013 letter we assigned the Draft EIS a Lack of Objections (LO) rating. An LO rating means that EPA did not identify potential environmental impacts requiring substantive changes to the proposal. While we did not identify impacts requiring substantive changes, we recommended that the Forest continue to explore incorporating principles of ecological forestry into harvest prescriptions.

Incorporating principles of ecological forestry into harvest prescriptions – such as developing and implementing marking guidelines that focus on creating or maintaining individuals, clumps, and openings as key structural elements – aligns with a broad body of science emerging about dry and moist mixed conifer forests.¹ We appreciate that some activity units will lend themselves to a clumpy look after treatment simply because of the existing condition, and that for exceptionally dense stands “More conscious and deliberate efforts to create “skips and gaps” using variable-retention marking may be included within the marking guidelines at the discretion of a certified silviculturist and District Ranger.”² Because we believe establishing mosaic patterns at the stand and landscape scales increases forest resilience, we recommend that the Record of Decision include additional information on the Forest’s plans for incorporating ecological forestry principles into harvest prescriptions.

If you have any questions or concerns please contact me at (206) 553-1601 or by electronic mail at reichgott.christine@epa.gov, or you may contact Erik Peterson of my staff at (206) 553-6382 or by electronic mail at peterson.erik@epa.gov.

Sincerely,

A handwritten signature in blue ink, reading "Christine B. Reichgott", is positioned above the typed name.

Christine B. Reichgott, Manager
Environmental Review and Sediment Management Unit

¹ http://www.fs.fed.us/pnw/publications/MMC_Synthesis_21Nov13.pdf

² FEIS, p. G-45